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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re "A Million Little Pieces Litigation"	MDL Docket No. 1771
THIS DOCUMENT RELATES TO ALL ACTIONS	

DECLARATION OF SCOTT FROST, ESQUIRE IN SUPPORT OF "A MILLION LITTLE PIECES" PLAINTIFFS' GROUP'S MOTION FOR CONSOLIDATION AND APPOINTMENT OF CO-INTERIM CLASS COUNSEL

I, Scott Frost, Esquire hereby declares:

1. I am an attorney, duly licensed and admitted to practice law in the State of Illinois and the United States District Court for the Northern District of Illinois. I am an attorney in the law firm of Statman, Harris, Siegel & Eyrich, LLC, counsel for Plaintiff Jill Giles in these coordinated proceedings. I have personal knowledge of the facts set forth in this Declaration. If called upon and sworn as a witness, I could and would competently testify to these facts.

2. In April 2006, I, along with co-counsel Larry Drury and Evan Smith, attempted via email and/or telephone, to contact all Plaintiffs' counsel to coordinate a Plaintiffs' leadership structure. We were successful in putting together all Plaintiffs' counsel with the exception of counsel for Plaintiff Rubenstein. Co-Plaintiffs in one action, Taylor and Hauenstein, were part of the instant group until they decided to withdraw.

3. I specifically called counsel's office, prior to April, 2006 for Plaintiff Rubenstein on at least one occasion. The purpose of the call was two fold:1) an effort to

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determine what interest counsel had, if any, in joining in a Motion to Transfer the pending actions to the Northern District of Illinois and to determine what interest, if any, counsel had in joining a group of Plaintiff's lawyers. I did not receive a response.

4. I have at all times been kept abreast of the status of the settlement communications with Defendants via emails and telephone conferences with proposed co-Interim Class Counsel and have been privy to all of the "A Million Little Pieces" Plaintiffs' Group emails that have gone to all counsel in the group regarding status of the negotiations and settlement documents.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: September 22, 2006

Scott Frost, Esquire